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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 INTERNATIONAL GAME TECHNOLOGY and  
15 IGT-UK GROUP LIMITED,

Case No. 2:16-cv-02792-APG-NJK

16 Plaintiff,  
17 v.  
ILLINOIS NATIONAL INSURANCE CO.,

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY  
DEADLINES**

18 Defendant.

**(Third Request)**

20 Plaintiffs International Game Technology and IGT-UK Group Limited (collectively “IGT”)  
21 and Defendant Illinois National Insurance Co. (“INIC”), by and through their respective counsel of  
22 record, hereby stipulate and request that the Court extend certain discovery deadlines by  
23 approximately sixty (60) days. This is the third request by any party to extend any discovery  
24 deadlines in this matter.

25 Pursuant to Local Rule 26-4, the parties state as follows:

26 **I. DISCOVERY COMPLETED TO DATE**

27 • The parties conducted the Fed. R. Civ. P. 26(f) conference.  
28 • The parties have exchanged initial and supplementary disclosures of documents and

lists of witnesses, including the exchange of tens of thousands of pages of documents.

- IGT propounded requests for production of documents, to which INIC has responded.
- INIC propounded requests for production of documents and interrogatories on IGT, to which IGT has responded.
- IGT propounded interrogatories and requests for admissions on INIC, to which INIC has responded.
- IGT has noticed the depositions of INIC's 30(b)(6) designee and multiple current and former INIC employees.
- IGT issued subpoenas to multiple third-parties requesting production of documents.
- IGT issued subpoenas for deposition to three former employees of INIC.
- INIC propounded requests for admission and an additional set of requests for production of documents on IGT, to which IGT has responded.
- The parties have engaged in multiple meet and confer teleconferences regarding the above discovery.

## **II. DISCOVERY TO BE COMPLETED**

- Deposition(s) of Rule 30(b)(6) designee(s) of INIC.
- Deposition(s) of current and former employees and/or representatives of INIC.
- Deposition(s) of Rule 30(b)(6) designee(s) of IGT.
- Deposition(s) of current and former employees and/or representatives of IGT.
- Deposition of the Rule 30(b)(6) designee(s) and/or officers/employees of Marsh & McLennan Companies, Inc.
- Deposition of additional non-party fact witnesses.
- Disclosure of expert witnesses and rebuttal.
- Depositions of expert witnesses.

The above list is made without prejudice to the Parties' ability to conduct additional discovery or to object to such discovery consistent with the Federal Rules of Civil Procedure.

1                   **III. REASONS WHY DISCOVERY CANNOT BE COMPLETED WITHIN THE**  
2                   **CURRENT SCHEDULE**

3                   As the Court is aware from the parties' previous submissions and as outlined above, the  
4                   parties in this case have engaged in written discovery and have attempted to resolve several  
5                   discovery issues that have arisen between them. Despite those efforts, the parties have reached an  
6                   impasse on several issues relating to the scope of discovery pending resolution of two motions that  
7                   are now before the Court: a motion by IGT to amend its complaint to assert causes of action for  
8                   breach of the implied covenant of good faith and fair dealing and violations of Nevada's Unfair  
9                   Claims Settlement Practices Act and a motion by IGT to compel discovery of documents and  
10                  deposition testimony from INIC. Absent a ruling from the Court on these pending motions, which  
11                  may impact the scope and extent of permissible discovery in this action, the parties are not able to  
12                  complete discovery and disclosure of expert opinions in this case under the current schedule.  
13                  Consequently, the parties request that the Court extend the remaining discovery deadlines,  
14                  beginning with the deadline for disclosure of expert witnesses, by approximately sixty (60) days,  
15                  as outlined below.

16                  The parties agree that this extension is not made for the purposes of delay, but to allow  
17                  additional time for the court to decide the Motion for Leave and for the parties to complete fact  
18                  discovery, as necessary, before disclosing experts to ensure a just adjudication of the case on the  
19                  merits, and that none of them will be prejudiced by an extension.

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1                   **IV. PROPOSED SCHEDULE**

2                   WHEREFORE, the parties respectfully request that this Court extend discovery deadlines  
3 as follows:

4 <b>EVENT</b>	5 <b>CURRENT DEADLINE</b>	6 <b>PROPOSED DEADLINE</b>
7                   Add Parties/Amend 8                   Pleadings	9                   July 13, 2017	10 <b>No Extension Requested</b>
11                  Designate Expert 12                  Witness(es)	13                  December 11, 2017	14 <b>February 9, 2018</b>
15                  File Interim Status Report	16                  December 11, 2017	17 <b>February 9, 2018</b>
18                  Designate Rebuttal 19                  Witness(es)	20                  January 8, 2018	21 <b>March 16, 2018</b>
22                  Close of Discovery	23                  February 9, 2018	24 <b>April 13, 2018</b>
25                  File Dispositive Motions	26                  March 12, 2018	27 <b>May 11, 2018</b>
28                  Joint Pretrial Order	29                  April 9, 2018	30 <b>June 8, 2018</b> 31                  *In the event dispositive motions 32                  are filed, the date for filing the 33                  Joint Pretrial Order shall be 34                  suspended until 30 days after the 35                  decision of the dispositive 36                  motions or further order of Court.

37                  Dated: November 15<sup>th</sup>, 2017

38                  Dated November 15<sup>th</sup>, 2017

39                  BOWLER DIXON & TWITCHELL LLP

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41                  PONZI & RUDLOFF PC

42                  \_\_\_\_\_  
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64                  *Counsel for Plaintiffs International Game  
65                  Technology and IGT-UK Group Limited*

66                  *Counsel for Defendant Illinois  
67                  National Insurance Co.*

68                  IT IS SO ORDERED.

69                   **ORDER**

70                  DATED this 16 day of November, 2017.

71                    
72                  UNITED STATES MAGISTRATE JUDGE